

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CALEB MICHAEL DUDLEY,

Plaintiff,

Civil Action No. 3:25-cv-13

v.

STEPHANIE MORTON, *et al.*

Defendants.

**UNOPPOSED MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO PLAINTIFF’S MEMORANDUM IN OPPOSITION (ECF NO. 17) TO
DEFENDANT MORTON’S MOTION TO DISMISS (ECF NO. 12)**

COMES NOW, Defendant, STEPHANIE MORTON (“Morton” or “Defendant”) and for her unopposed Motion for Extension of Time to Respond to Plaintiff’s Memorandum in Opposition (ECF No. 17) to Defendant Morton’s Motion to Dismiss (ECF No. 12) provides as follows:

1. On January 10, 2025, Plaintiff Caleb Dudley (“Plaintiff” or “Dudley”) filed his Complaint. ECF No. 1. Defendant Morton filed a Motion to Dismiss and accompanying Memorandum in Support on March 1. ECF Nos. 12 and 13.
2. Dudley, by counsel, filed an Opposition to the Motion to Dismiss on April 7, 2025. ECF No. 17.
3. Any reply to that Opposition to the Motion to Dismiss was required by April 14, 2025, pursuant to local rules.
4. Defendant’s counsel is experiencing a heavy case load and has several substantive deadlines during the month of April.

5. Defendant's counsel asked attorney for Plaintiff Dudley for additional time to respond to the Opposition to the Motion to Dismiss, making her response due on April 21. Plaintiff Dudley's counsel agreed.

Therefore, Defendant Morton respectfully requests this Court extend her deadline to file any reply to Plaintiff Dudley's Opposition to Defendant Morton's Motion to Dismiss (ECF No. 17) to Monday, April 14, 2025, and grant any other relief this Court finds just and necessary.

Respectfully submitted,

STEPHANIE MORTON

Defendant

By: /s/ Cassandra E. Sheehan
Cassandra E. Sheehan, AAG, VSB No. 87990
Criminal Justice & Public Safety Division
Correctional Litigation Section
Office of the Attorney General
202 North 9th Street, Sixth Floor
Richmond, Virginia 23219
Telephone: (703) 359-1117
Facsimile: (804) 786-4239
Email: csheehan@oag.state.va.us
Counsel for Defendant Morton

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of April 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send notification of such filing to all counsel of record. There are currently no *pro se* parties in this matter.

By: /s/ Cassandra E. Sheehan
Cassandra E. Sheehan, AAG, VSB No. 87990
Criminal Justice & Public Safety Division
Correctional Litigation Section
Office of the Attorney General